

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA**

1.	SHARON HALL,	)	
		)	
	Plaintiff,	)	
		)	
v.		)	Case No. 14-cv-651-JED-PJC
1.	FAIRFAX MEDICAL	)	JURY TRIAL DEMANDED
	FACILITIES, INC.	)	ATTORNEY LIEN CLAIMED
		)	
	Defendants.	)	

**COMPLAINT**

**COMES NOW THE PLAINTIFF** and for her causes of action herein alleges:

**PARTIES**

1. The Plaintiff is Sharon Hall, an adult resident of Osage County, Oklahoma.
2. The Defendant is Fairfax Medical Facilities, Inc., a company doing business in Osage County, Oklahoma.

**JURISDICTION AND VENUE**

3. Plaintiff's claim are for gender discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, and the Oklahoma Anti-Discrimination Act (OADA). Jurisdiction over the federal claims are vested in this Court under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. § 1331. Because the state law claims arise out of the same core of facts, jurisdiction are vested over those claims under 28 U.S.C. § 1367(a).
4. Most of the actions complained of occurred in Osage County, Oklahoma and the Defendant's may be served in that county. Osage County is within the Northern District of the United States District Courts for Oklahoma wherefore venue is proper in this Court under 28 U.S.C. § 1391(b).

**STATEMENT OF FACTS**

5. Defendant employs more than fifteen employees during at least twenty (20) weeks of the current or proceeding calendar year. Accordingly, the Defendant covers employers under Title VII. There is no minimum employee requirement to be a

covered employer under the OADA.

6. Plaintiff was employed with the Respondent as Chief Executive Officer (CEO) from around August 2005 until she was terminated around May 27, 2014.
7. Prior to her termination the Plaintiff had never been disciplined and performed her job duties in a satisfactory manner.
8. Around February 2014 Neal McConaghy (Board President) made a comment that the organization did not need “more women”, but rather needed “a man who will make decisions”.
9. Plaintiff was offended at the discriminatory comment and complained about the comment to Mr. McConaghy, including telling Mr. McConaghy that the comment was inappropriate and should not be said again.
10. Another Board member, Jeff Lockett, has made comments about men being valued more highly than women and about women causing too much drama.
11. Plaintiff was terminated around May 27, 2014.
12. The only reason for the termination given was that the company wanted to change the direction in leadership.
13. Plaintiff was replaced by Ben Helm (male).
14. As a direct result of the Plaintiff’s termination she has suffered (and continues to suffer) lost wages (including back, present and front pay along with the value of benefits associated with such wages) and emotional distress/dignitary harm including sadness, frustration, embarrassment and similar unpleasant emotions.
15. At the least Defendant’s conduct was motived by her gender (female) and/or her complaint of gender discrimination such that she is entitled to the protections of the mixed motive doctrine.
16. Plaintiff has exhausted her administrative remedies by timely filing an EEOC charge of discrimination on June 30, 2014. The EEOC issued Plaintiff her right to sue letter

on September 24, 2014 and Plaintiff received such letter thereafter. This complaint is timely filed within ninety days of Plaintiff's receipt of her right to sue letter.

17. Discrimination on the basis of gender and retaliation after Plaintiff complained of gender discrimination, violate Title VII and the OADA.
18. Plaintiff is entitled to compensation for her lost wages (past, present and future including the value of benefits associated with such wages), emotional distress/dignitary harm damages, attorney fees and costs and liquidated damages under the OADA.
19. Because the actions of the Defendant were willful, malicious or, at the least, in reckless disregard for Plaintiff's federally and state protected rights such that Plaintiff is entitled to an award of punitive damages under the federal claim.

**WHEREFORE**, Plaintiff prays that she be granted judgment in her favor and against the Defendant on all of her claims and that this Court grant the Plaintiff all available compensatory damages, punitive damages, liquidated damages, pre- and post-judgment interest, costs, attorney's fees and any other legal or equitable relief allowed by law.

**RESPECTFULLY SUBMITTED THIS 27<sup>th</sup> DAY OF OCTOBER, 2014.**

s/ Amber L. Hurst  
\_\_\_\_\_  
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